



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

#10

MEMORANDUM

DATE: September 26, 1986

TO: Enforcement Decision Group - Gary King

FROM: David Jansen and Stafford Dusenbury, DLPC/FOS - Springfield Region

SUBJECT: LPC #1178020001 and LPC #1178020003 - Macoupin County
Brighton/Brighton Landfill #1 & #2
ILD#000667139
Enforcement

The purpose of this memorandum is to request enforcement action on the above facility due to outstanding violations observed during an August 21, 1986 Subpart F inspection. Violations outstanding are as follows:

Section 725.190(a); the current groundwater monitoring program may be incapable of determining the facility's impact on the groundwater quality in the uppermost aquifer and hydraulically connected aquifers underneath the facility.

Section 725.191(a)(1); monitoring wells currently designated as up-gradient may not be representative of background groundwater quality in the uppermost aquifer and hydraulically connected aquifers.

Section 725.192(a); a sampling and analysis plan, which includes procedures and techniques specified in Section 725.192(a), has not been implemented.

Section 725.192(b); concentrations or values of parameters specified within this section have not been determined.

Section 725.192(c)(1); initial background concentrations or values of parameters specified in 725.192(b) were not determined quarterly for the first year.

Section 725.194(a)(2)(b); failure to submit the required groundwater evaluations as part of the Annual Report.

These violations were previously included in the USEPA Compliance Order signed in the fall of 1985 and remain outstanding. We are requesting that EDG refer these violations to USEPA for enforcement.

DCJ/SVD/is

cc: DLPC/FOS, Central Region
DLPC/Division File
DLPC/Compliance, Mark Haney

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